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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365

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MEMORANDUM

Date: August 19, 1992

Subject: Risk review comments on ecological aspects, Olin Corporation NPL site, McIntosh, Alabama.

From: Lynn H. Wellman, Life Scientist
Office of Health Assessment
Waste Management Division

Thru: Elmer Akin, Chief
Office of Health Assessment
Waste Management Division

To: Cheryl W. Smith, Remedial Project Manager
North Superfund Remedial Branch
Waste Management Division

Per your request, I have reviewed the **Environmental Evaluation Technical Memorandum** document for the Olin Corporation NPL site, McIntosh, Alabama. My comments provided below are divided into two sections, i.e., (1) comments specifically to you the RPM and (2) comments that, if you concur, can be conveyed verbatim to the party responsible for preparation of the document. To facilitate the verbatim conveyance, I will be pleased to provide on request a copy of this memo in Word Perfect format via cc:mail.

General Comments to the RPM

It is a policy of the EPA Region IV Office of Health Assessment to require written responses to review comments provided by this office. If a meeting with the PRP is to be held to discuss these comments, we request that written responses be provided prior to such a meeting. We also request that any risk assessment comments received from the State or any other source be provided to the Office of Health Assessment for our site file. If risk comments from sources other than this office are forwarded to the PRP contractor, the source should be clearly identified unless concurrence of this office is sought. In this case, we should formally review these comments and provide you with our response before they are forwarded.

My comments concern the use of Region IV Screening Values for surface water and sediment in the preliminary evaluation of the surface water and sediment contaminant levels (comment number 1), the need to contact State and Federal natural resource trustees for historical information concerning threatened and endangered species (comment number 2), and the need to determine potential ecological

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impacts from water, sediment, and biota crossing the facility boundary (comment number 5). In addition, I have identified three typographical errors (comments number 3, 4, and 6).

Comments to be Conveyed to the Responsible Party

1. 2.0 Chemicals of Potential Concern, Page 12 - The Region IV Surface Water Screening Values should be used in evaluating the surface water contaminant levels for those contaminants which do not have criteria. Screening values are not criteria.
2. Endangered and Threatened Plant Species, Page 36 - The Federal and State natural resources trustees should be contacted for historical data, etc., concerning endangered and threatened species and their critical habitat.
3. Typographical Error, Page 43, 3rd Paragraph, Fourth Line - A slash, "/", ends the sentence instead of a period, ".".
4. 5.0 Future Activities, Page 56, Second Paragraph - The word "species" should be added to the last sentence so it will read "... the apparent stress to the two tree species."
5. 5.0 Future Activities - This section should contain a proposal to address the potential ecological effects of the migration of contaminants past the facility boundary via water, sediments, and biota.
6. Table 6, Vascular Plant Species found in Operable Unit 2 - The second and fifth pages lack a line separate the two species listed at the bottom of these pages.